

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAMES GINZKEY, RICHARD
FITZGERALD, CHARLES CERF, BARRY
DONNER, and on behalf of the class members
described below,

Plaintiffs,

v.

NATIONAL SECURITIES CORPORATION,
a Washington Corporation,

Defendant.

Case No.: 2:18-cv-01773-RSM

**STIPULATED MOTION TO REVISE
BRIEFING SCHEDULE REGARDING
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

NOTE ON MOTION CALENDAR:
NOVEMBER 5, 2020
WITHOUT ORAL ARGUMENT

Plaintiffs James Ginzkey, Richard Fitzgerald, Charles Cerf, and Barry Donner (collectively, "Plaintiffs") and Defendant National Securities Corporation ("Defendant") (collectively, the "Parties"), by and through their undersigned attorneys, hereby submit this Stipulated Motion to Revise the Briefing Schedule Regarding Plaintiffs' Motion for Class Certification in this case.

IT IS HEREBY STIPULATED:

WHEREAS, Plaintiffs filed this putative class action against Defendant National Securities Corporation, alleging that it was negligent in conducting due diligence and approving for sale certain securities in a solar company, Beamreach. Defendant denies Plaintiffs' claims.

WHEREAS, Plaintiffs filed a motion for class certification on November 3, 2020. Their motion seeks to certify a class of “All persons who invested in Beamreach Offerings ... through the Defendant, at any time between February 6, 2015 and February 9, 2017 inclusive” and multiple subclasses.

WHEREAS, Defendant anticipates that because of the complicated issues raised by Plaintiffs’ motion, Defendant will require additional time to analyze the motion and prepare its response to Plaintiffs’ motion for class certification. Plaintiffs do not oppose an extension of the briefing schedule for their motion for class certification.

NOW THEREFORE, in consideration of the Parties’ stipulation and good cause shown, the Parties respectfully request the Court’s approval of this Motion to Revise the Briefing Schedule Regarding Plaintiffs’ Motion for Class Certification as follows:

Deadline for Defendant’s Response	December 8, 2020
Deadline for Plaintiffs’ Reply	December 22, 2020

DATED: November 5, 2020

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Attorneys for Defendant

National Securities Corporation

IT IS SO ORDERED.

DATED: November 6, 2020.



RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE